

May 6, 2020

***Via ECF***

The Hon. Kevin P. Castel  
 United States Court – Southern District of New York  
 500 Pearl Street – Room 11D  
 New York, NY 10007

Re: **Ousmane Bah v. Apple Inc. and Security Industry Specialists**  
**Our Client: Security Industry Specialists**  
**Docket No.: 19 cv 3539**  
**LJAA File No.: 0270-1037-NY00**

Your Honor:

As Your Honor is aware, this office represents the defendant, Security Industry Specialists (“SIS”) in the above-referenced matter.

On behalf of my client, and with consent of the parties, we respectfully request an extension to Monday, May 11<sup>th</sup> to file the ESI Protocol. This is the second request, as Your Honor previously granted an extension from April 29<sup>th</sup> to May 6<sup>th</sup>. In the interim (and beforehand) the parties, in conjunction with our respective technology specialists, have continued to engage in productive and good faith conferences regarding the ESI Protocol. Another proposed version was circulated today, however I have been unable to connect with the necessary contact at my West Coast client.

It is expected that the additional time will allow the parties to agree upon a final version, without the need for court intervention.

Thank you for your consideration.

Respectfully submitted,

*David Metzger*

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cc: all counsel of record via ECF